



6. This offense was committed within the jurisdiction of Canada. A warrant for Lazore's arrest was issued on August 28, 2019, by Judge Chantal Lamarche of the Province of Quebec, Canada.

7. The warrant was issued on the basis of the following facts:

On the morning of August 11, 2019, emergency services in Akwesasne, a Mohawk Indian territory within Quebec, Canada, received a call requesting assistance at the residence of Jeffrey Lazore ("Jeffrey") in Akwesasne. Police and first responders arrived at and entered Jeffrey's residence. There, they saw Jeffrey lying on his couch, which was close to the entrance door to his residence. Jeffrey had a severe puncture wound to the top of his head, and blood was in his hair and pooling on the floor next to the couch. Jeffrey was still alive but having significant trouble breathing.

Medical personnel removed Jeffrey from his home and transported him to a community hospital, where his injury was identified as a gunshot wound. He was subsequently airlifted to Ottawa General Hospital, where he was pronounced dead that afternoon. A subsequent autopsy concluded that Jeffrey had been shot at close range. During the autopsy, examiners removed a .22 caliber round from his skull.

The police investigation into Jeffrey's death revealed the following:

Police inspected Jeffrey's residence, as well as the surrounding area where they located a pack of "Seneca" cigarettes on the bumper of a vehicle parked close to his house. Police also interviewed Brett Curleyhead, ("Curleyhead"). Curleyhead had been arrested earlier on August 11, 2019, on unrelated offenses. He was also known to be in a romantic relationship with Jeffrey's daughter. On the evening of August 10, 2019, Jeffrey had filed a report with Akwesasne police stating that Curleyhead and Jeffrey's daughter had stolen a generator from

him.

Curleyhead told police that he had been with James Johnson (“Johnson”) throughout the evening of August 10, 2019, and into the morning of August 11, 2019, until Curleyhead had been arrested on the unrelated charges. When police interviewed Johnson, he too stated that he and Curleyhead had been together during that time, but not in the place that Curleyhead had claimed that the two had been.

Police then interviewed Curleyhead for a second time. This time, Curleyhead admitted that he had knowledge about Jeffrey’s murder, and stated: that Jeffrey had been killed with a .22 caliber rifle; that Curleyhead had been communicating with the killer; and that he became aware of the homicide at 2:30am on August 11, 2019. Curleyhead further said that he and Johnson drove by Jeffrey’s residence on the early morning of August 11, 2019. Johnson went inside Jeffrey’s residence but then came back to their car stating that Jeffrey was asleep on his couch.

Police also interviewed Jeffrey’s daughter, who stated that she had been able to view Curleyhead’s Facebook Messenger communications and observed a message from Curleyhead to Johnson stating, “let’s go get some loot.” In response, Johnson asked whether the loot was “guaranteed.” She reported that these Facebook communications were time stamped 3:09am on August 11, 2019.

Police re-interviewed Johnson, who stated that he wanted to talk with police and reveal that he knew who killed Jeffrey. He admitted that he and Curleyhead arrived at Jeffrey’s residence early on August 11, 2019, and that he had picked up Curleyhead after received a message from Curleyhead about getting money. But Johnson denied entering Jeffrey’s home.

Johnson said that he knew that Lazore, Jeffrey's "nephew"<sup>1</sup> killed Jeffrey. Johnson stated he knew this fact because Curleyhead told Johnson that Lazore had committed the murder.

Accordingly, police interviewed Curleyhead for a third time. During this third interview, Curleyhead told police that Lazore murdered Jeffrey. Curleyhead stated that Lazore told Curleyhead that he was going to kill Jeffrey so that Lazore could take possession of Jeffrey's residence. Curleyhead further stated that on the morning of August 10, 2019, Lazore showed Curleyhead a .22 caliber rifled that Lazore said he would use to kill Jeffrey. Lazore also stated that after he killed Jeffrey, he would send Curleyhead a coded text to let him know, so that Curleyhead could enter Jeffrey's residence and take Jeffrey's money. Curleyhead reported at 2:30AM on August 11, 2019, he checked his phone and saw a text from Lazore stating, "I already went to the restaurant and ate without you," which Curleyhead knew to be the coded text indicating that Lazore had killed Jeffrey. In turn, Curleyhead sent Johnson a text saying that they should go and look for money.

Curleyhead stated that prior to traveling to Jeffrey's house, he and Johnson stopped at Lazore's residence and Curleyhead went inside Lazore's home to talk with Lazore. Lazore told Curleyhead that he had walked into Jeffrey's house without waking him and shot him in the head. Lazore also showed Curleyhead the .22 caliber rifle again, which he placed on top of a dresser in Lazore's residence. Curleyhead said that he and Johnson did, in fact, later enter Jeffrey's residence but thought that he was asleep and that Lazore had lied about the murder.

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<sup>1</sup> According to witnesses with knowledge of the Lazore family, Jeffrey and Lazore may actually be cousins. However, according to Canadian authorities, it is not unusual within the Mohawk culture for a younger male family member nevertheless to describe an older male family member as an "uncle," when describing the relationship between the two.

Accordingly, Curleyhead sent Lazore a text stating “he is still there.” In response, Lazore responded “you better take him fishing,” which Curleyhead took to mean that he should dispose of Jeffrey’s body in a river.

Police later interviewed Lazore’s common-law wife, who stated that Lazore had left home on the afternoon of August 11, 2019, and had not returned for three days. She also stated that Lazore smokes “Seneca” cigarettes.

On August 20, 2019, Dane Gorrow (“Gorrow”) provided a statement to investigators. He reported that around midnight on August 10, 2019, he and a friend of his spoke with Lazore at his residence. At that time, Lazore told Gorrow and his friend that Lazore had killed his cousin, Jeff.<sup>2</sup> When asked if he was serious, Lazore stated that he was; that he had shot his victim on the top of his head; and that Jeffrey had not seen the shot coming. Lazore also said that he was worried that Curleyhead and Johnson were aware of his actions and that they might talk to police.

Gorrow also later told a Canadian police detective that Victor told him he wanted to say “good-bye”; that Gorrow should tell his family that he appreciated everything that they had done for him; that their conversation would be the last time they would see each other; and that Lazore wanted to see his children one last time.

8. The offense with which Lazore is charged is provided for in Article 2 of the Treaty.

9. Lazore may be found within the jurisdiction of this Court in Franklin Country Jail, Malone, New York, where he is known to have been arrested and is believed to be currently detained on unrelated charges by U.S. authorities.

10. The Government of Canada has represented that it will submit a formal request for extradition supported by the documents specified in the Treaty, within the time required under the Treaty.

11. Lazore may be likely to flee if he learned of the existence of a warrant for his arrest, if this warrant has not been executed prior to his release from Franklin County Jail.

WHEREFORE, the undersigned requests that a warrant for the arrest of the aforementioned person be issued in accordance with 18 U.S.C. § 3184 and the extradition treaty between the United States and Canada, and that this complaint and the warrant be placed under the seal of the Court, except as disclosure is needed for its execution, until such time as the warrant is executed.

  
Katherine Kopita  
Assistant United States Attorney

Sworn to before me and subscribed in my presence this 26<sup>th</sup> day of  
Sept., 2019 at 8:30 AM in Plattsburgh NY

  
Hon. Gary L. Favro  
United States Magistrate Judge

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<sup>2</sup> See n.1, *supra*.